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No.

1. Plaintiff Ashley Bostic (“Plaintiff”) filed this putative class action lawsuit

against GRC in the Circuit Court of Madison County on February 10, 2021. The case number in the Circuit Court is 47-cv-2021-900206.00.

2. GRC was served with the Complaint on February 16, 2021. A copy of the as-served Complaint and summons is attached as **Exhibit 1**. No other process, pleadings, or orders were served on GRC.

3. In her Complaint, Plaintiff alleges GRC sent a collection letter seeking payment on her outstanding student loan debt and, in her sole cause of action, she alleges that the collection letter violated the FDCPA, a federal statute. Plaintiff purports to bring a class action.

4. Under 28 U.S.C. § 1331, federal district courts have “original jurisdiction of all civil actions arising under the Constitution, laws, or treaties of the United States.” The Court therefore has original jurisdiction over Plaintiff’s claims, which arise under federal law. *See Gunn v. Minton*, 568 U.S. 251, 257 (2013) (“Most directly, a case arises under federal law when federal law creates the cause of action asserted.”).

5. Based on the foregoing, this case may be removed under § 1441(a), which provides:

[A]ny civil action brought in a state court of which the district courts of the United States have original jurisdiction, may be removed by the defendant or the defendants, to the district court of the United States for the district and division embracing the place where such action is pending.

6. This civil action was originally filed in Madison County, which is within the Northern District of Alabama, Northeastern Division. 28 U.S.C. § 81(a)(2). Therefore, venue is proper in this Court. *See* 28 U.S.C. § 1446(a) (“A defendant . . . desiring to remove any civil action from a State court shall file in the district court of the United States for the district and division within which such action is pending a notice of removal . . .”).

7. Pursuant to 28 U.S.C. § 1446(d), a copy of this Notice of Removal will be promptly served on Plaintiff’s counsel and filed with the Madison County Circuit Court.

8. This notice is timely under 28 U.S.C. § 1446(b)(1) because GRC is filing it within 30 days of being served with the Complaint.

9. There are no other Defendants in this action whose consent is required for removal.

10. By filing this Notice of Removal, GRC has not waived, and expressly reserves, its right to raise any and all procedural and/or substantive defenses.

WHEREFORE GRC requests that the Court accept jurisdiction over this civil action and issue all necessary orders and process to remove this civil action from the Circuit Court of Madison County to the United States District Court for the Northern District of Alabama.

Respectfully submitted on March 16, 2021.

s/Charles W. Prueter

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**Pro hac vice applications forthcoming*

*Counsel for Defendant General Revenue
Corporation*

CERTIFICATE OF SERVICE

I certify that on March 16, 2021, I electronically filed the foregoing document and exhibit with the U.S. District Court for the Northern District of Alabama. I further certify that I will serve a copy of the same via U.S. Mail and email on counsel for Plaintiff Ashley Bostic.

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s/Charles W. Prueter
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